

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**COALITION PLAINTIFFS' RESPONSE TO STATE DEFENDANTS'  
MOTION FOR LEAVE TO FILE MATTERS UNDER SEAL**

Coalition Plaintiffs file this Brief in Response to the State Defendants' Motion for Leave to File Matters Under Seal (Doc. 1575).

Coalition Plaintiffs join in the positions taken by the Curling Plaintiffs in their Brief (Doc. 1582), and address only the sealing of Coalition Plaintiffs' experts' deposition transcripts (Doc. 1570-5 (Stark) and Doc. 1570-6 (Skoglund)).

Coalition Plaintiff **oppose** the sealing of Dr. Stark's deposition transcript (Doc. 1570-5). The State Defendants, and the Curling Plaintiffs, agree that there is no need to seal Dr. Stark's deposition and, under the authorities cited in the Curling Plaintiffs' brief, the motion with respect to Dr. Stark's deposition transcript should be denied.

Coalition Plaintiffs **consent in part** to the sealing of Kevin Skoglund's deposition and his declaration, which is attached as Exhibit 1 to his deposition transcript (Doc. 1570-6). There are several passages in the transcript and in the declaration that discuss

documents that non-party Doug Logan produced as “confidential.” Those passages should be redacted, but the redacted transcript and declaration should not be sealed and should be matters of public record. The undersigned is authorized to represent that the State Defendants and the Curling Plaintiffs have no objection to this handling of the Skoglund transcript and declaration. Coalition Plaintiffs will either provide the State Defendants with the redacted transcript and declaration for the State Defendants to file, or, if appropriate, file those redacted documents directly.

Respectfully submitted this 24<sup>th</sup> day of January, 2023.

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**CERTIFICATE OF COMPLIANCE AND SERVICE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14, and has been served on all counsel via the Court's electronic filing system.

This 24<sup>h</sup> day of January, 2023.

/s/ Bruce P. Brown  
Bruce P. Brown